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UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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UNITED STATES OF AMERICA : **CRIMINAL COMPLAINT**  
 :  
 v. : Honorable Cathy L. Waldor  
 :  
 KEVIN HILLS : Mag. No. 22-9101  
 :

I, Shaquille Johnson, the undersigned complainant being duly sworn, state the following is true and correct to the best of my knowledge and belief:

**SEE ATTACHMENT A**

I further state that I am a Special Deputy Marshal with the United States Attorney's Office for the District of New Jersey, and that this complaint is based on the following facts:

**SEE ATTACHMENT B**

*/s/ Shaquille Johnson/AMT*

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Shaquille Johnson  
Special Deputy Marshal  
United States Attorney's Office, District of New Jersey

Sworn to before me and subscribed in my presence,  
February 24, 2022, Essex County, New Jersey

Honorable Cathy L. Waldor  
United States Magistrate Judge

*/s/ Cathy L. Waldor/AMT*  
\_\_\_\_\_  
Signature of Judicial Officer

**ATTACHMENT A**

**COUNT 1**

**(Possession of a Firearm and Ammunition by a Convicted Felon)**

On or about June 19, 2021, in Essex County, in the District of New Jersey and elsewhere, the defendant,

**KEVIN HILLS,**

knowing that he had previously been convicted in a court of at least one crime punishable by a term of imprisonment exceeding one year, did knowingly possess in and affecting commerce a firearm, namely a Jimenez Model JA-Nine 9-millimeter caliber semiautomatic pistol bearing serial number 359158, and ammunition, namely 6 rounds of ball ammunition stamped “WIN 9mm LUGER” and 26 rounds of ball ammunition stamped “CCI NR 9mm LUGER”.

In violation of Title 18, United States Code, Section 922(g)(1).

**COUNT 2**

**(Possession of a Firearm and Ammunition by a Convicted Felon)**

On or about July 20, 2021, in Essex County, in the District of New Jersey and elsewhere, the defendant,

**KEVIN HILLS,**

knowing that he had previously been convicted in a court of at least one crime punishable by a term of imprisonment exceeding one year, did knowingly possess in and affecting commerce a firearm, namely a Ruger 9-millimeter P95DC semiautomatic pistol with an obliterated serial number, and ammunition, namely 10 rounds of 9-millimeter Luger ball ammunition and one round of 9-millimeter Luger hollow-point ammunition.

In violation of Title 18, United States Code, Section 922(g)(1).

## **ATTACHMENT B**

I, Shaquille Johnson, am a Special Deputy Marshal with the United States Attorney's Office for the District of New Jersey. I am fully familiar with the facts set forth herein based on my own investigation, my conversations with other law enforcement officers, and my review of reports, documents, and photographs of the evidence. Where statements of others are related herein, they are related in substance and part. Because this complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

### **The June 19, 2021 Shooting**

1. On or about June 19, 2021, during the late morning, an officer of the Newark Police Department ("NPD") heard multiple loud popping noises emanating from the vicinity of the intersection of Chadwick Avenue and Clinton Avenue in Newark, New Jersey.

2. NPD officers proceeded to that vicinity to investigate. Upon arrival, NPD officers discovered multiple spent shell casings lying on the sidewalk near 141 Chadwick Avenue (the "Spent Casings"), close to the intersection of Chadwick Avenue and Clinton Avenue. NPD officers also discovered a firearm, namely a Jimenez Model JA-Nine 9-millimeter caliber semiautomatic pistol bearing serial number 359158 (the "Count 1 Firearm"), near a vacant lot close to 141 Chadwick Avenue.

3. During its subsequent investigation, NPD recovered and reviewed relevant video footage obtained from multiple cameras that were operational and recording video at the time of the shooting. The first of these cameras faced Chadwick Avenue close to 141 Chadwick Avenue. Video from that camera recorded on June 19, 2021 (the "Chadwick Avenue Camera Video") shows the following:

a. Just before 11:42 a.m., a black Lincoln LS (the "Subject Lincoln") driving northbound on Chadwick Avenue pulled over and parked on the right side of the street opposite 141 Chadwick Avenue.

b. Three individuals then got out of the Subject Lincoln. In particular, a heavysset Black male wearing a white shirt, dark shorts, and dreads tied in a bun got out of the Subject Lincoln's rear passenger-side seat. I believe this individual to be HILLS based on information obtained during this investigation. Among other such information, this individual appears to match other images of HILLS obtained during this investigation.

c. At about 11:42 a.m., almost immediately after getting out of the Subject Lincoln, HILLS brandished a handgun in his right hand and ran across Chadwick Avenue toward 141 Chadwick Avenue, out of the camera's view. Puffs of smoke emanated from the handgun in HILLS' right hand before HILLS exited the camera's view. Based in part on this video, I believe that HILLS was firing the handgun at this time.

d. At about 11:43 a.m., around one minute after leaving the camera's view, HILLS reappeared on camera walking northbound on Chadwick Avenue toward Clinton Avenue, at which point HILLS once again exited the camera's view. At this point, no handgun is visible on HILLS' person.

4. The second camera was situated on the north side of Clinton Avenue between Bergen Street and Hunterdon Street, around one block east of the intersection of Chadwick Avenue and Clinton Avenue. Video from that camera recorded on June 19, 2021 (the "Clinton Avenue Camera Video") shows the following:

a. At about 11:45 a.m., around three minutes after the shooting at 141 Chadwick Avenue, a heavysset Black male wearing a white shirt, dark shorts, and dreads tied up in a bun. This individual appears to match the individual who appears in the video captured by the Chadwick Avenue camera. Based on this and other information obtained during this investigation, I believe this individual to be HILLS.

b. At this point, HILLS walked eastbound on the north side of Clinton Avenue away from the intersection of Chadwick Avenue and Clinton Avenue. HILLS then turned left onto Hunterdon Street, two blocks east of Chadwick Avenue, and exited the camera's view walking northbound.

c. Law enforcement captured a still image of HILLS from the Clinton Avenue Camera Video and retained it for further investigation and identification purposes (the "Clinton Avenue Image").

5. During its investigation, NPD officers also discovered the Subject Lincoln parked on Chadwick Avenue opposite 141 Chadwick Avenue, just as that car appears in the video captured by the Chadwick Avenue camera. After towing the Subject Lincoln from the scene, law enforcement obtained and executed a search warrant for the Subject Lincoln's interior. During that search, law enforcement discovered inside the Subject Lincoln 32 rounds of ammunition: 6 rounds of ball ammunition stamped "WIN 9mm LUGER" (the "Count 1 WIN

Ammunition”) and 26 rounds of ball ammunition stamped “CCI NR 9mm LUGER” (the “Count 1 CCI NR Ammunition”).

6. Law enforcement has conducted ballistic analysis of the Spent Casings and the Count 1 Firearm. That analysis shows that the Spent Casings were fired from the Count 1 Firearm.

7. Law enforcement has determined that the Count 1 Firearm was manufactured by Jimenez Arms Incorporated in Henderson, Nevada; that the Count 1 WIN Ammunition was manufactured by Winchester in East Alton, Illinois; and that the Count 1 CCI NR Ammunition was manufactured by Cascade Cartridge Incorporated in Lewiston, Idaho. Because each of these items was seized within New Jersey, they all had necessarily traveled in interstate commerce at some point before their seizure.

8. Law enforcement has also determined that the Count 1 Firearm is operable and is designed to expel a projectile by the action of an explosive.

#### **The July 20, 2021 Stop and Interview**

9. On or about July 20, 2021, an NPD detective (“Detective-1”) was on duty and driving along Clinton Avenue in Newark, New Jersey. Detective-1 had been assigned to investigate the June 19, 2021 shooting charged in Count 1 of this Complaint. While driving on this date, Detective-1 saw HILLS standing near 497 Clinton Avenue. Detective-1 recognized HILLS from the video he had previously reviewed as part of his investigation, including the Chadwick Avenue Camera Video and the Clinton Avenue Camera Video.

10. After spotting and recognizing HILLS, Detective-1 pulled over, got out of his car, and stopped HILLS. Detective-1 identified himself as an NPD detective and frisked HILLS for officer safety. While doing so, Detective-1 felt a hard object on the front of HILLS’ waistband that Detective-1 recognized as a handgun handle. Detective-1 lifted HILLS’ shirt, which revealed a handgun that Detective-1 then seized (the “Count 2 Firearm”).

11. Subsequent investigation determined the Count 2 Firearm to be a Ruger 9-millimeter P95DC semiautomatic pistol with an obliterated serial number. The Count 2 Firearm was loaded with 11 rounds of ammunition: 10 rounds of 9-millimeter Luger ball ammunition and one round of 9-millimeter Luger hollow-point ammunition.

12. After seizing the Count 2 Firearm, Detective-1 placed HILLS under arrest. HILLS was then transported to an NPD station for processing.

13. While at the NPD station, HILLS agreed to a voluntary interview with Detective-1 after being advised of his *Miranda* rights. During that interview,

Detective-1 showed HILLS the Clinton Avenue Image. HILLS stated to Detective-1 that he was indeed the individual shown in the Clinton Avenue Image.

14. Law enforcement has determined that the Count 2 Firearm was manufactured by Ruger in Prescott, Arizona, and that the 11 rounds of ammunition found in the Count 2 Firearm and also underlying the offense charged by Count 2 of this Complaint were each manufactured by various manufacturers at locations in states other than New Jersey. Because each of these items was seized in New Jersey, they all had necessarily traveled in interstate commerce at some point before their seizure.

15. Law enforcement has also determined that the Count 2 Firearm is operable and is designed to expel a projectile by the action of an explosive.

**Hills' Prior Felony Conviction**

16. On or about January 11, 2019, HILLS pleaded guilty in the Superior Court of New Jersey, Essex County, to aggravated assault on a corrections officer, in violation of N.J.S.A. 2C:12-1B(5)(H), a third-degree crime under New Jersey law punishable by up to five years' imprisonment.

17. On or about March 22, 2019, the court sentenced HILLS to three years' imprisonment for this offense.